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 [Additional Counsel Listed on Following Pages]

14  
**UNITED STATES DISTRICT COURT**  
 15  
**NORTHERN DISTRICT OF CALIFORNIA**  
 16  
**SAN FRANCISCO DIVISION**

17 IN RE UBER TECHNOLOGIES, INC.  
 18 PASSENGER SEXUAL ASSAULT  
 19 LITIGATION

20 This Document Relates To:

21 *WHB 823 v. Uber Technologies, Inc., et al.*,  
 Case No. 24-cv-4900;  
 22 *A.R.2 v. Uber Technologies, Inc., et al.*,  
 Case No. 24-cv-7821;  
 23 *B.L. v. Uber Technologies, Inc., et al.*,  
 Case No. 24-cv-7940;  
 24 *Dean v. Uber Technologies, Inc., et al.*, Case  
 No. 23-cv-6708;  
 25 *LCHB128 v. Uber Technologies, Inc., et al.*,  
 Case No. 24-cv-7019; and

Case No. 3:23-md-03084-CRB (LJC)

STIPULATION AND [PROPOSED] ORDER  
 TO RESET DEADLINES RE PTO NO. 26

Judge: Hon. Charles R. Breyer  
 Courtroom: Courtroom 6 – 17th Floor

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1        WHEREAS, on May 1, 2025, the Court issued Pretrial Order No. 26: Bellwether Trial Wave 1  
2 Case Assignments and Discovery Schedule;

3        WHEREAS, Pretrial Order No. 26 required the parties to exchange expert reports by August 8,  
4 2025 and rebuttal expert reports by September 8, 2025;

5        WHEREAS, on July 8, 2025, the Court issued Pretrial Order No. 28: Order on Defendants' Motion  
6 to Dismiss Plaintiffs' Bellwether Complaints. Pursuant to the Federal Rules of Civil Procedure,  
7 Defendants' Answers to the Bellwether Complaints are due July 22, 2025.

8        WHEREAS, the parties agree to set dates for Defendants' Answers, such that Defendants will  
9 answer all Wave 1 Plaintiffs' Short-Form Complaints and the Master Long-Form Complaint on August  
10 5, 2025, and will answer the remaining Bellwether Complaints on August 19, 2025.

11        WHEREAS, the parties agree that fact discovery that remains to be completed requires extending  
12 the deadlines for expert discovery.

13        WHEREAS, the parties agree that the Expert Deadlines as set out at PTO 26 Paragraph be modified  
14 such that the exchange of expert reports will move from August 8 to August 22. The exchange of rebuttal  
15 expert reports will move from September 8 to 22.

16        WHEREAS, the parties agree that the close of discovery, as set out at PTO 26 Paragraph c will  
17 move from September 22, 2025 to October 6, 2025.

18        WHEREAS, the parties agree that extending the aforementioned deadlines will not require  
19 extending any other deadlines set by Pretrial Order No. 26.

20        THEREFORE, the parties respectfully request the Court enter the parties' stipulation that  
21 Defendants provide answers on the dates set out above, and that the following deadlines set by Pretrial  
22 Order No. 26 be extended as follows:

23        • The parties shall exchange expert reports by August 22, 2025.  
24        • The parties shall exchange expert rebuttal reports by September 22, 2025.  
25        • The close of discovery will be October 6, 2025.

27        **IT IS SO STIPULATED.**

1 DATED: July 17, 2025

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15 DATED: July 17, 2025

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## **ATTERTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

DATED: July 17, 2025

/s/ *Laura Vartain Horn*  
Laura Vartain Horn

1 **[PROPOSED] ORDER**  
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4 **IT IS SO ORDERED.**  
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7 Dated: \_\_\_\_\_  
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10 Honorable Charles R. Breyer  
11 United States District Judge  
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